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TO:

Federal Communications Commission
Office of Secretary
445 12th Street SW
Washington, DC 20554

FROM:

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Comments on: 476 CFR Chapter 1
Possible Revision or Elimination of Rules

Subpart C – Operating Requirements & Procedures
80.141 General Provisions for ship stations.

Para (1) Compulsory Radiotelegraph ships …
This paragraph could be eliminated since it is no longer relevant.

Para (20 Compulsory radiotelephone ships ….
This paragraph could be eliminated since it is no longer relevant

Subpart E – General Technical Standards

80.203 Authorization of transmitters for licensing.

Para (3) Programming of authorized channels ….
The wording of this paragraph does not reflect the realities of today's modern equipment. In the case of Globe Wireless, transmitters may be automatically placed on FCC pre-authorized frequencies by use of remote computers. The resultant performance is then monitored to ensure compliance with the rules. The computers select form pre-authorized frequencies only and software engineers enter these frequencies from a list provided by the Government & Regulatory Affairs Dept. of Globe Wireless. We suggest that para (3) be eliminated.

Sub para (L)
Recommended rewording:
"Ship station transmitters may be certificated for emissions not shown in 80.205 of this part provided such emissions comply with the bandwidth requirements of the frequency in use.

80.205 Bandwidths.
This para should be modified to reflect whatever changes are made to para 80.207

80.207 Classes of emission.
Some of these emissions may be obsolete.
Is it necessary to list emission types other than the emission types that are allowed on distress frequencies ? I do not see the need. Certain emissions are subject to interpretation and could be classified using different codes. The individual codes are subject to interpretation. For example, F1B is used for radio telex transmissions but almost all marine radios using this mode operate in USB. One could argue that the code should be J1B. I suggest that the emissions allowed on distress frequencies be specified and that for other frequencies "any emission type may be authorized provided such emission is contained within the authorized bandwidth of the frequency in use."

If it is decided to list all possible and/or commonly used emission types, it is recommended the following be added:
2K80J2D
2K80F1B
2K80F7B

80.355
Should be deleted.

80.357
Should be deleted.

80.363 Frequencies for facsimile.
Sub para (a)
Suggested rewording: " The non-paired frequencies with data/fax transmissions which are assignable to ship stations for data/fax are as follows:"

((Note we are suggesting that no further coast station assignments be made in this band. This will protect limited data/fax spectrum for ship station use))

The frequencies available to ships are insufficient to match the frequencies available to cost stations for data/fax. This is aggravated by the fact the ships band is also available to coast stations. The two frequencies per band listed as being available to USA ships for data/fax is totally unrealistic. Ships should be authorized to use any frequency in the band.

Sub para (1)
Suggested rewording:
"Ship station frequencies. The following bands are available to ship stations for data/fax transmission. "

Sub para (2)
I suggest that the reference to 3 Khz be eliminated.
In reality many different bandwidths are being used in these bands by both commercial and especially military operations. 300 Hz to 8 Khz is common. Since frequency and bandwidth assignments are subject to coordination with government users and to the avoidance of interference to existing users, the reference to 3 Khz appears to be irrelevant. I can supply a sample database of existing active assignments showing a wide variety of bandwidths and emissions.

80.371 Public correspondence frequencies.
Sub para (a)
I no longer see the need for separate allocations for each coast. It is easier and simpler to make allocations based on the avoidance of interference both domestically and internationally.

Sub para (b)
With the almost total demise of international duplex voice services, the Appendix 25 planning System is no longer relevant or used by the majority of countries. I suggest that allocations be made based on the general principles of non-interference to existing assigned domestic and international services.

80.373 Private communications.
The demand for these frequencies should be re-evaluated.

80.375
Reference to frequencies 410 and 500 should be deleted.

80.802 Inspection of station.
Should be eliminated.

80.836
Should be modified to reflect the elimination of 80.802

2002/11/06

Sub para (2)
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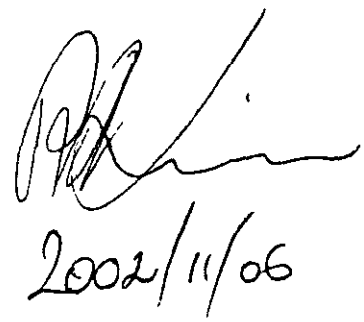

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